

**NETWORK DEPOSITION SERVICES**  
**Transcript of Michael Michaelson**

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1 IN THE UNITED STATES DISTRICT COURT  
2 DISTRICT OF SOUTH CAROLINA  
3 GREENVILLE DIVISION

4 FLAME SPRAY NORTH ) CA No.  
5 AMERICA, INC., ) 6:18-CV-02845-DCC  
6 )  
7 Plaintiff, )  
8 vs. )  
9 KERR PUMPS INC., )  
10 Defendant. )

11 Videotape Deposition of MICHAEL MICHAELSON  
12 Tuesday, May 4, 2021

13 Filed on behalf of the Defendant  
14 Counsel of Record for this Party:  
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23 NETWORK DEPOSITION SERVICES  
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1 Q. Okay. And do you mean that the  
2 coating, the chrome coating itself, is fragile?

3 A. I don't know that the coating is  
4 fragile. It seemed more prone to damage versus  
5 Colmonoy.

6 Q. When you were buying chrome plungers,  
7 do you know who you were buying those from?

8 A. It would have been the fluid end OEMs  
9 at that point in time. And I wasn't  
10 responsible for this product line at that  
11 point, but we were buying predominantly from  
12 the OEM manufacturers.

13 Q. Okay. Is Kerr one of those?

14 A. Not at that time, no.

15 Q. Okay. Have you ever had coating  
16 delamination on a Colmonoy-coated plunger?

17 A. Truthfully, I don't know.

18 Q. Okay. Has UPP ever done any business  
19 with Kerr's sister company Flow Valve?

20 A. Yes.

21 Q. And what do you guys purchase from  
22 Flow Valve?

23 MR. SPEED: Object to the  
24 form. Also, object on the grounds of  
25 relevance.

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1 Q. You can answer.

2 A. We purchased a small -- we were  
3 purchasing what's known as a one by two valve  
4 primarily.

5 Q. And are those valves coated in any  
6 way?

7 A. I do not know. I'm not involved with  
8 that, with Flow line products.

9 Q. Has UPP ever purchased any clappers  
10 from Flow Valves?

11 A. Clappers? I don't know what you mean.

12 Q. They are also called flappers.

13 A. I don't know what you are asking with  
14 that.

15 Q. And you may not even be familiar with  
16 this product, but they have a product, they're  
17 either called clappers or flappers.

18 A. Check valves. We purchased check  
19 valves from them.

20 Q. Okay. Have you guys had any kind of  
21 issues, performance or otherwise, with any  
22 products purchased from Flow Valve?

23 A. Again. I don't know. I'm not  
24 involved with that product line at all.

25 Q. Okay. For the 2017/2018 time period,